

INSPECTOR'S REPORT
EPSOM & EWELL BOROUGH COUNCIL
STATEMENT OF COMMUNITY INVOLVEMENT

Inspector: Keith Holland BA(Hons) Dip TP MRTPI ARICS

Date: 1st February 2006

Epsom & Ewell Borough Council - Statement of Community Involvement (June 2005)

INSPECTOR'S REPORT

Introduction

1.1 An independent examination of the Epsom & Ewell Borough Council Statement of Community Involvement (SCI) has been carried out in accordance with Section 20 of the Planning and Compulsory Purchase Act. Following paragraph 3.10 of Planning Policy Statement 12: Local Development Frameworks the examination has been based on the 9 tests set out (see Appendix A). The starting point for the assessment is that the SCI is sound. Accordingly changes are made in this binding report only where there is a clear need in the light of the tests in PPS 12.

1.2 A total of 20 written representations were received all of which have been considered. Clarification was sought on 3 matters from the Council and the response received has been taken into account (see Appendix B).

Test 1

2.1 The Council has undertaken the consultation required under Regulations 25, 26 and 28 of the Town and Country Planning (Local Development) (England) Regulations 2004 as evidenced by the Submission and Pre-Submission Consultation Statements.

2.2 This test has been met.

Test 2

3.1 This test is met by Section 2.1.1 of the SCI, which highlights the need to establish close links between the LDF preparation and the Community Strategy. The LDF will spatially express the parts of the Community Strategy that relate to the use and development of land and will help to achieve its objectives

3.2 This test has been met.

Test 3

4.1 The Council has set out in Table 3 on page 15 of the SCI those groups which will be consulted. This list includes the statutory bodies from PPS12 Annex E. The Council states that it aims to exceed the minimum legal consultation requirements in paragraph 2.1.5. Table 4 on page 16 of the SCI sets out how the Council proposes to meet the consultation requirements set down in the Planning and Compulsory Purchase Act 2004.

4.2 This test has been met.

Test 4 and Test 5

5.1 These tests are considered together as they are interrelated.

5.2 Section 2.1.2 of the SCI addresses the need for early community involvement. In the initial stages of development (evidence gathering), the Council will seek to involve key groups, which will have an interest in the ensuing Local

Development Documents. Chart 1 on page 13 of the SCI illustrates the stages and consultation points in the preparation of Development Plan Documents (DPDs) and Supplementary Planning Documents (SPDs), indicating early engagement of the community at the issues and options stage.

5.3 Table 4 on page 16 of the SCI sets out the consultation methods to be used during the production of DPDs and SPDs. Consultation methods are amplified in Appendix 2 of the SCI. Section 1.2 of the SCI outlines community characteristics in the Borough and lists communities that will be consulted including 'hard to reach' groups. Appendix 2 also states that documents available for inspection by the community during set consultation periods can include various languages and be available in Braille.

5.4 The SCI needs to be more specific concerning its strategy for the engagement of the whole community in the LDF process including 'hard to reach' groups. Otherwise tests 4 and 5 are met.

Recommendation

(R1) Add the following text as a new paragraph 2.1.6 to the SCI:

"EEBC has a longstanding commitment to consultation with its community using a broad range of consultation techniques, and has an excellent record of engaging members of its Citizens Exchange Panel (now called FEEDBACK). It has had a Consultation Strategy since 2000, which is regularly reviewed and updated. All consultation activities are coordinated through the Council's Service Improvement Unit, which also has produced a very practical "Consultation Handbook" to assist anyone engaged in consultation exercises in achieving maximum benefit from the process. The Unit will work with us in planning and implementing the campaign in order to reach the people we need to consult at each stage of the LDF. EEBC has experience of using a wide range of innovative techniques which will be used to engage hard to reach groups. These have included interviews, workshops, focus groups, public meetings and face-to-face interviews.

Hard to reach groups are not necessarily difficult to engage, but are more of a challenge for a variety of reasons, such as the need to provide them with suitable access to information and/or consultation forums. The Council has links with many of these groups by way of the established "Local Strategic Partnership" and its Community Development Officer, and is currently developing further links with the Borough's schools, to improve participation from these groups. Familiarity of surroundings and an informal approach can help people feel more comfortable and allow them to participate more freely. We envisage focus groups, private workshops and one-to-one meetings with such groups, arranged at convenient times and in appropriate locations for them to easily access, being organised as part of our campaign.

The Council's Local Strategic Partnership (LSP) was set up in 2001 and comprises organisations from business, education and training, health, police, religious, ethnic minority, youth, environmental and voluntary sectors. Other existing networks have been developed by the Council's Community Development Officer, who works with residents, voluntary groups, and businesses to support activities in the community. These include groups within the Race and Community Relations Network and the Ethnic Minorities Working Party, as well as residents' groups within the 2 most deprived wards within the Borough, and those moving into the large hospital cluster

housing development. This network of connections will be utilised to assist consultation with harder to reach groups within the community.

With regard the specific issue of literacy, all planning publications can be provided in large print, Braille, on audiotape or diskette, as well as in other languages, as requested. This will be specifically stated in each document. In terms of consultation methods, telephone surveys and face-to-face interviews can be arranged to facilitate participation with people with literacy difficulties. As with other consultation processes, these will be supported by the Council's Service Improvement Manager working within the broad context provided by the Council's Consultation Strategy."

Test 6

6.1 This test has been met by Section 1.3.3 of the SCI. The section contains a table, which sets out basic resource implications for the consultation methods that the Council is considering in terms of costs and staff time. The resources available will be set through the Council's budgeting processes.

6.2 This test has been met.

Test 7

7.1 Appendix 3 of the SCI sets out the steps that will be taken in handling responses received from the various consultation exercises to be undertaken. The precise method of analysis will depend on the consultation technique used. Appendix 4 of the SCI provides detail on how the Council intends to provide feedback. However, to provide additional clarity Appendix 3 should contain some additional wording. Furthermore, the Council has suggested that an additional step concerning the public examination of the DPD or SCI should be included in Appendix 3.

Recommendations

(R2) Insert the following sentence at the end of the first paragraph in Appendix 3:

"Decisions will be taken by both officers and members"

(R3) Insert the following text at the end of Step 6 in Appendix 3:

"...,which will be reported to members".

(R4) Insert a new Step 8 at the end of Appendix 3:

"Submission of DPD or SCI to the Government Office followed by a 6-week period of consultation and public examination of the soundness of that document. The examination Inspector will then issue a binding report to the Council."

Test 8

8.1 The SCI does not provide any information on monitoring and review. In order to meet Test 8, I recommend that a new section be inserted in the SCI as set out below.

Recommendation

(R5) Insert the following new section entitled "Monitoring and Review" in the SCI:

“EEBC will seek to improve its community engagement methods by regularly and critically reviewing their effectiveness in the planning process. This will include evaluating the method of consultation undertaken with an appropriate analysis of the results (e.g. measuring the number of persons attending, the number of responses received and seeking views of participants in the whole process). We will seek to learn lessons for future consultation exercises. The review will be done in collaboration with the Council’s Service Improvement Unit. We will incorporate the results of this process in the Annual Monitoring Report. Where a significant change is required in the procedures or programme included in the SCI, for example to meet new circumstances or challenges, or to address deficiencies in the existing system, the authority will identify this in the AMR. Where appropriate it will review the SCI and resubmit it to the Secretary of State, subject to the necessary adjustments to the Local Development Scheme.”

Test 9

9.1 The SCI at section 2.2 clearly describes the Council’s policy for consultation on planning applications. Table 5 on page 19 of the SCI meets the minimum requirements set out in legislation. Table 6 on page 20 of the SCI sets out methods of community involvement in planning applications. This section of the SCI also distinguishes between procedures appropriate to different types and scale of application, and includes information on how the consultation results will inform decisions (“Deciding Applications” – page 21 of the SCI). Paragraph 2.2.2 sets out the Council’s policy towards pre-application consultations.

9.2 This test has been met.

Conclusion

10.1 Subject to amendment in accordance with the above Recommendations the Epsom & Ewell Borough Council Statement of Community Involvement (June 2005) is sound.

A handwritten signature in black ink, appearing to read 'KHolland', is written over a vertical red line.

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